

73408-3

3/5/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

March 5, 2013

Eliot Harrison, Agent for Stella-Jones Corporation  
c/o Lewis & Harrison  
122 C Street N. W. Suite 505  
Washington, DC. 20001

Subject: Creosote For Pressure Application  
EPA Registration Number: 73408-3  
Application Date: December 3, 2012

Dear Mr. Harrison:

The Agency has reviewed your amendment submitted in accordance with continuing registration under the Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended, and determined the action acceptable.

In summary, your request to add "Net Contents" and delete the references to "lot number" and "assay" on page 1 has been accepted. Your request to delete the inappropriate Physical and Chemical Hazards heading and two sentences underneath is accepted.

A stamped copy of the accepted labeling is enclosed. Submit one copy of your final printed labeling before distributing or selling the product bearing the revised labeling.

If you have any questions about this letter, please contact Tom Luminello by telephone, (703) 308-8075, or by e-mail at [luminello.tom@epa.gov](mailto:luminello.tom@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Tom Luminello".

Jacqueline Campbell  
Product Manager 34  
Regulatory Management Branch II  
Antimicrobials Division (7510 P)

**RESTRICTED USE PESTICIDE**

**DUE TO CHRONIC TOXICITY IN ANIMAL STUDIES.**

For sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

# **CREOSOTE FOR PRESSURE APPLICATION**

**FOR PRESSURE TREATMENT OF WOOD**

**Active Ingredient:**

**Coal Tar Creosote (AWPA P2 Standard)**

**55.00 %**

**Other Ingredients**

**45.00 %**

**Total**

**100.00%**

**CONTAINS PETROLEUM DISTILLATES**

## **CAUTION**

See [side] [back] panel for additional precautionary statements, [First Aid], and complete Directions for Use.

**EPA Reg. No. 73408-3**

**EPA Est. No.**

**Net Contents:**

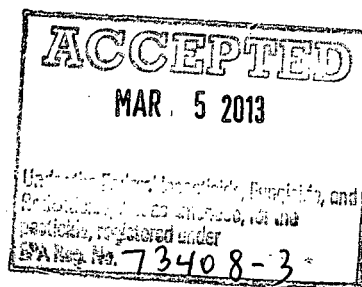
**Manufactured by:**

**Stella-Jones Corporation**

**Two Gateway Center**

**603 Stanwix Street, Suite 1000**

**Pittsburgh, PA 15222**



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| <b>FIRST AID</b>   |  |
|--|--|
| If In Eyes   | <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>                            |
| If on Skin or Clothing   | <ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>  |
| If Swallowed   | <ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person. Do not give any liquid to the person.</li> </ul> |
| If Inhaled   | <ul style="list-style-type: none"> <li>• Move person to fresh air</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>                         |
| <b>HOTLINE NUMBER</b>  |  |
| Have the product label or MSDS with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-424-9300 for emergency medical treatment information. |  |
| <b>NOTE TO PHYSICIAN</b>   |  |
| Probable mucosal damage may contraindicate the use of gastric lavage. Vomiting may cause aspiration pneumonia. Contains petroleum distillates.   |  |

## PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**Caution:** Causes moderate eye irritation. Harmful if swallowed, inhaled or absorbed through skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wear protective eye wear (goggles, protective glasses or face shield). Wash thoroughly with soap and water after handling and before eating, drinking, using tobacco, chewing gum, or going to the toilet. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Prolonged and repeated skin exposure over many years in the absence of recommended hygiene practices may lead to changes in skin pigmentation, benign skin growth and in some cases, result in skin cancer. The inhalation exposure limit to creosote vapor is 0.2 mg/m3 OSHA PEL (\* Hour TWA) for Coal Tar Pitch Volatiles (benzene soluble fraction) as specified in 29 CFR 1910.1002. Prolonged or repeated inhalation exposure above the limit may lead to respiratory system effects such as inflammation and possibly changes in liver, thyroid and blood elements.

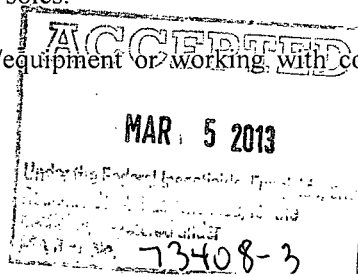
See side panel for additional precautions and First Aid.

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

All personnel handling treated wood or handling treating equipment (including poles/hooks used to retrieve charge cables) that has come into contact with preservative must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves, and
- Socks plus industrial grade safety boots with chemical resistant soles.

All personnel cleaning or maintaining the treatment cylinder gasket/equipment or working with concentrate or wood treatment preservative must wear the following PPE:



- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety boots with chemical resistant soles, and
- A full face shield.

In the event of equipment malfunction, or for door spacer placement, all personnel located within 15 feet of the cylinder opening prior to cylinder ventilation must wear the following PPE:

- Washable or disposable coveralls or long-sleeved shirt and long pants,
- Chemical resistant gloves,
- Socks plus industrial grade safety boots with chemical resistant soles, and
- A properly fitting half mask elastomeric respirator with appropriate cartridges and/or filters.

Entry to confined spaces is regulated by Federal and/or State Occupational Safety and Health Programs. Compliance is mandated by law. Individuals who enter pressure treatment cylinders or other related equipment that is contaminated with the wood treatment preservative (e.g. cylinders that are not free of treatment preservative or preservative storage tanks) must wear protective clothing and/or equipment as required by Federal and/or State Occupational Safety and Health Compliance laws.

## USER SAFETY REQUIREMENTS

Personnel must leave aprons, protective coveralls, chemical resistant gloves, work footwear, and any other material contaminated with preservative at the treatment facility.

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

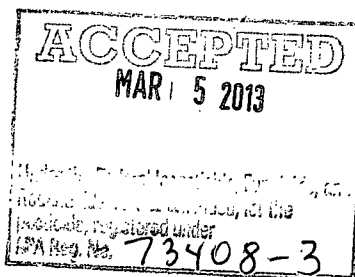
Discard clothing and other absorbent material that has been drenched or heavily contaminated with the product's concentrate. Do not reuse them.

Eating, drinking, smoking are prohibited in the treatment cylinder load-out area, drip pad area, and engineering control room of the wood treatment facilities. EXCEPTION: Where treating operator control rooms are isolated from the treating cylinders, drip pad, and work tanks, eating, drinking, and smoking (depending on local restrictions) are permitted.

## USER SAFETY RECOMMENDATIONS

Users must:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet,
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.



## ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollution Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

## DIRECTIONS FOR USE

### Restricted Use Pesticide

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

For preservation of wood products listed in the American Wood Protection Association (AWPA) Use Category System (refer to [www.awpa.com/standards/ULexcerpt.pdf](http://www.awpa.com/standards/ULexcerpt.pdf)). Specific uses include: terrestrial and aquatic nonfood wood/wood structure protection treatments via pressure methods for utility poles/cross arms, railroad ties, switch ties, bridge timbers, fence and guardrail posts, foundation timbers, marine and foundation round piles, sawn lumber and timber products, and exterior structural composite glue laminated wood and plywood products. Treated wood is intended for exterior outdoor uses only. Do not use this product on wood intended for use in homes.

For specific retention rates, follow the use instructions in the AWP A Use Categories given below:  
UC 1, 2, 3B, 4A, 4B, 4C, 5A, 5B, 5C

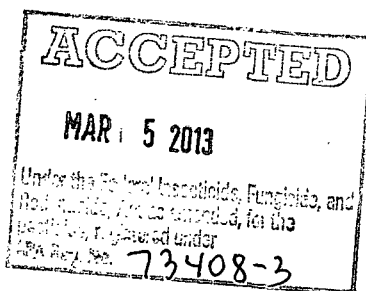
## APPLICATION

Engineering Controls to be put in place as of December 31, 2013:

- For pressure treatment with creosote, automatic, remotely operated devices must be used to open, close, lock, and unlock cylinder doors,
- Mechanical methods must be used to place/remove bridge rails

General Instructions for Creosote Pressure Treatment:

- Cylinder openings and door pits must use grating and additional measures such as sumps, dams or other devices which prevent or remove spillage of the preservative.
- Personnel must not directly handle the charge tables, poles or hooks used to retrieve charge cables, or other equipment that has contacted the preservative without wearing chemical resistant gloves.
- In the event of equipment malfunction, or to place the spacer to hold the door open during venting, only personnel wearing specified PPE are permitted within 15 feet of the cylinder opening prior to ventilation.

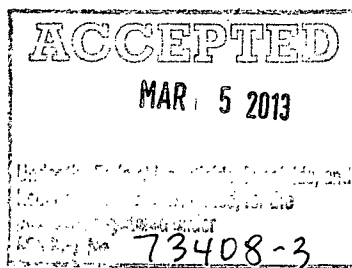


#### The Treatment Process:

- A final vacuum must be used to remove excess preservative from the wood. The final vacuum must attain a vacuum equal or greater than the initial vacuum. This vacuum must be held for an appropriate time period based on wood species, retention levels, and commodity treated to remove excess preservative from the wood.
- For treated wood that will be used in marine or other aquatic or sensitive environments, a double vacuum must be used. Following the pressure period and once the creosote has been pumped back to the work tank, a vacuum shall be applied for a minimum of one hour at not less than 22 inches of Hg (560 KPa) (adjusted for elevation) of vacuum to recover excess preservative. Then following "breaking" the vacuum and returning to atmospheric pressure, pull a second vacuum for a minimum of one hour at not less than 22 inches of Hg (560 KPa) (adjusted for elevation).
- After creosote treatment, wood must be moved to a drip pad capable of recovering excess preservative until the wood is drip free.

#### Ventilation Process (at conclusion of treatment):

- The cylinder must be ventilated by purging the post-treatment cylinder through fresh air exchange. The ventilation process is considered complete after a minimum of 2 volume exchanges based on the empty treatment cylinder volume. The exhaust pipe of the vacuum system or any air moving device utilized in conducting the air purge must terminate into a containment vessel such as a treating solution work tank or water/effluent tank.
- The ventilation process may be accomplished by one of the following methods: 1) activating an air purge system that operates while the cylinder door remains closed; or 2) using a device to open and hold open the cylinder door (no more than 6 inches) to allow adequate ventilation and activating the vacuum pump.
- If the second method is utilized, at the conclusion of the treatment, no personnel may be located within 15 feet of the cylinder when open (cracked) until the cylinder has been ventilated.
- After ventilation is complete, the cylinder door may be completely opened.



For product packaged in rigid, non-refillable containers greater than 5 gallons.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage:** In case of spillage, absorb (with sand, earth, etc.) and dispose of in accordance with applicable Federal, State and local regulations. Contaminated materials must be handled and managed as a RCRA Hazardous Waste and treated before disposal in an approved landfill. This waste is identified by the EPA as a U051 hazardous waste and must meet the treatment standards specified in 40 CFR 268 Subpart D. An RCRA Hazardous Waste Storage permit is required for storage of wastes beyond 90 days.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. **Container Handling:** Nonrefillable container; do not reuse or refill this container. Triple rinse (or equivalent) container promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container  $\frac{1}{4}$  full with solvent. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available; or reconditioning, if appropriate; or puncture and dispose of in a sanitary landfill; or by incineration.

[Per PR Notice 97-4, the batch code/lot number will appear on the label or container when not distributed in transport vehicles.]

[Note to Reviewer: Container handling instructions are not required for transport vehicles by 40 CFR§156.140(e) and 156.144(g)]

**CONTAINER HANDLING:** [For the end-user's bulk tanks]. Refillable container. Refill with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing the container. Cleaning before refilling is the responsibility of the refiller. Use standard industry practices for cleaning bulk containers or contact the registrant for more information.

